



Direct Dial: 302-472-7315

shirzel@hegh.law

January 20, 2023

VIA CM-ECF

The Honorable Leonard P. Stark
 U.S. District Court for the District of Delaware
 844 North King Street
 Wilmington, Delaware 19801

Re: *Gold Reserve Inc. v. Bolivarian Republic of Venezuela*, Misc. No. 22-0453-LPS:
 Submission of Agreed Upon Proposed Order and Intervenor Petróleos de Venezuela,
S.A.'s Request for Extension to File a Joint Status Report

Dear Judge Stark:

We write on behalf of Intervenor Petróleos de Venezuela, S.A. (“PDVSA”) in regards to the Court’s order, dated January 11, 2023 (the “Order”), that, in part, directed the parties to submit: (i) a joint status report and (ii) a proposed order effectuating the Court’s decision granting PDVSA’s motion to intervene and denying PDVSA’s motion for a stay and setting a briefing schedule on Plaintiff’s attachment motion. D.I. 14. On January 12, 2023, PDVSA submitted a letter motion (“PDVSA’s January 12 Letter”) requesting a 7-day extension of the deadline to comply with the Court’s Order in view of the ongoing process to implement the recently revised “Statute to Govern a Transition to Democracy to Reestablish the Full Force and Effect of the Constitution of the Bolivarian Republic of Venezuela” (the “Transition Statute”). D.I. 15. This Court granted PDVSA’s requested extension.

The parties have conferred and are jointly submitting herewith a proposed order (the “Proposed Order”) effectuating the Court’s decision granting PDVSA’s motion to intervene and denying PDVSA’s motion for a stay, which is attached hereto as Exhibit A. However, PDVSA still lacks sufficient clarity regarding the ongoing process of implementing the Transition Statute to address the remaining issues raised in the Court’s Order. PDVSA hopes to obtain sufficient clarity on these recent developments within the next week, and the parties are continuing to meet and confer regarding these issues.

Accordingly, for the reasons stated in PDVSA’s January 12 Letter and the reasons stated herein, PDVSA respectfully requests a further 7-day extension of the deadline to submit a joint status report and proposed briefing schedule. Counsel for Plaintiff consents to PDVSA’s requested 7-day extension, and the Proposed Order filed herewith incorporates the parties’ stipulation to a 7-day extension.



The Honorable Leonard P. Stark

January 20, 2023

2 | Page

Respectfully submitted,

/s/ Samuel T. Hirzel

Samuel T. Hirzel, II (#4415)

cc: All Counsel of Record (via CM-ECF)